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February 15, 2005

Ms. Francine Torres, Administrator
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW., Room 4008-So, AG Stop 0268
Washington, D.C. 20250-0200

Re: National Organic Standards Board Livestock Committee

Dear Ms. Torres:

I am writing to convey my unequivocal support for the recommendations of the National Organic Standards Board Livestock Committee, from February 1, 2005, regarding pasture requirements for the National Organic Program. In order to remain a conscientious consumer and continue to trust the USDA "organic" label, it is imperative that the USDA seal represent the true meaning of "organic." The following reasons make true organic farming necessary to the betterment of our health and the health of our world:

- Pasture for ruminants ensures an organic production system which provides living conditions that allow animals to satisfy their natural behavior patterns, provides preventative health care benefits and fulfills the majority of the public's expectations of humane animal care and welfare.
- Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity.
- Allowing the cows to go to their food rather than bringing feed to the cows means less use of machinery and non-renewable resources. Animals utilizing pasture naturally avoid the concentration of manure issues associated with dry lot production.
- Active management of quality pasture is an excellent way to improve soil quality.
- Careful rotation of pasture ensures maximum utilization of the capture of solar energy, the basis for growing all food. Allowing some pasture areas to be fallow for a portion of the season benefits biodiversity by providing habitat for grassland birds.
- According to a recent study conducted by the Danish Institute of Agricultural Research, milk from cows farmed organically was 50% higher in Vitamin E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study tied these qualities to organic cows having more room to graze and a diet high in forage, fresh grass and clover.